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## State Of Ohio Environmental Protection Agency

P.O. Box 1049, 361 East Broad St., Columbus, Ohio 43216-1049  
(614) 466-8565

Richard F. Celeste, Governor

January 20, 1988

RE: JACKSON COUNTY  
JACKSON COUNTY LANDFILL

John A. Noyes  
Burgess & Niple, Limited  
5085 Reed Road  
Columbus, Ohio 43220

Dear Mr. Noyes:

This letter is in response to your proposal titled "Response to Orders No. 3 and No. 6 of the Director of the Ohio Environmental Protection Agency, Jackson Landfill, Ohio" submitted on behalf of your client Sanitary Commercial Services. Orders No. 3 and No. 6 required the submittal of a groundwater monitoring assessment plan and detail plans for a leachate collection system, respectively.

Upon review, Ohio EPA has determined that the response as submitted does not conform to the requirements of the Directors orders. The ground water monitoring assessment plan is not sufficient to determine the impact of the facility on the ground water and the response submitted does not constitute detailed plans for a leachate collection system. In order to achieve compliance with the Director's order, the response will need to incorporate, at a minimum, the following provisions:

Ground Water Monitoring Assessment:

1. The actual preferred leachate pathway shall be determined since this has not been studied.

The assessment plan states that because there is shale at the base of the landfill (+740 feet), the preferential pathway of leachate movement would be laterally along the surface of the shale, breaking out at the landfill perimeter. However, the plan fails to mention the ten foot layer of sandstone beneath the shale as seen in borings from the 1986 hydrogeologic study, and the effect it would have on the actual leachate pathway. Therefore, the actual leachate pathway must be demonstrated.

2. Install monitoring wells which will extend to the first water bearing zone beneath the landfill. The wells in place now are 300 or more feet away from the fill, and are all upgradient. Therefore, new monitoring wells must be placed no more than 50 feet from the fill. Further, they must ring the perimeter of the fill, and be spaced no more than 300 feet from each other.
3. Ohio EPA, SEDO, shall be given written notification of the date for installation of the monitor wells. Notification shall be given at least seven days prior to installation.
4. All monitoring wells shall be sampled quarterly for two years, then semi-annually for the remainder of the post closure period. All data shall be submitted to the Ohio EPA Southeast District Office, (SEDO) within fourteen (14) days after sample analysis is complete.
5. The list of parameters on page seven for both ground water and surface water analyses shall be extended to include TOC, arsenic, barium, cadmium, chromium, lead, selenium, and nitrate.
6. As stated in Order No. 4, should Ohio EPA determine remedial action is necessary, a contingency plan shall be developed and submitted.

#### Leachate Collection System

1. Detail plans, specifications and information shall, as a minimum, be submitted to allow the immediate construction of a leachate collection drain around the perimeter of the landfill at the toe of the outer slope. Collection drains shall be installed along the face of the slope as needed. The drain system shall be interconnected to a leachate holding system properly sized using standard methods for determining the water balance of the landfill.
2. Construction of the leachate collection system shall commence within ten (10) days after receipt of written approval of the final plans by Ohio EPA. Installation of the system shall be completed within thirty (30) days after the initiation of construction. Ohio EPA shall be notified by letter of both the initiation and completion of construction within seven (7) days after each event.

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3. All leachate collected by the system shall be transported off site for treatment (operator may wish to consider the Jackson Municipal Wastewater Treatment Plant).
4. The landfill shall be inspected at least once per month to determine if new leachate outbreaks have occurred. If new outbreaks are discovered, the collection system will be expanded to contain the additional leachate within thirty (30) days after discovery. Ohio EPA shall be notified by letter of both the discovery of new leachate outbreaks and of the completion of required system expansion to contain such outbreaks within seven (7) days after the occurrence of each event.

Please submit your revised plans to the Southeast District Office within thirty (30) days after receipt of this letter. Failure to submit revised plans which contain, at a minimum, the above provisions for both the ground water monitoring assessment and leachate collection system will result in continued non-compliance with the Director's Final Findings and Orders issued August 20, 1987 and subsequent referral to the Attorney General's Office for legal action.

If you have any questions, feel free to contact me at this office or Tom Harcarik of our Central Office at 614-481-7227.

Sincerely,

Richard L. Shank, Ph.D.  
Director

SLH:dm

cc: Chuck Taylor, DSHWM, CO  
cc: Mike Savage, DSHWM, S & E, CO  
cc: Tom Harcarik, DSHWM, S & E, CO  
cc: Nancy Henderson, DGW, SEDO  
cc: Carl Greever, Jackson County Health Commissioner  
cc: Gregory Fields, Sanitary Commercial Services  
cc: Steve Hamlin, DSHWM, SEDO